

EXHIBIT B

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10 RASIER, LLC, and RASIER-CA, LLC

11 *[Additional Counsel Listed on Following Pages]*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 IN RE: UBER TECHNOLOGIES, INC.,
16 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

17 This Document Relates to:

18 ALL ACTIONS

17 **DECLARATION OF SCOTT BINNINGS**
18 **IN SUPPORT OF DEFENDANTS' JUNE**
19 **11, 2025 PRIVILEGE DISPUTE BRIEF**
20 **PURSUANT TO SPECIAL MASTER**
ORDER NO. 4, § II (MAY 19, 2025
PRIVILEGE LOG CHALLENGES)

21 **DECLARATION OF SCOTT BINNINGS**

22 I, Scott Binnings, having personal knowledge of the following state:

23
24 1. I am the Associate General Counsel, Safety and Core Services, at Uber. I was first
25 employed by Uber in April 2015 and have worked as in-house legal counsel for the past 10 years. My
26 previous positions included Senior Counsel, Regulatory; Senior Counsel, Safety; Legal Director,
27 Safety; Senior Legal Director, Safety; and Senior Legal Director, Safety, Payments, and Risk. In my

28 DECLARATION OF SCOTT BINNINGS IN SUPPORT OF DEFENDANTS' JUNE 11, 2025 BRIEF PURSUANT TO
SPECIAL MASTER ORDER NO. 4, § II (MAY 19, 2025 PRIVILEGE LOG CHALLENGES)

Case No. 3:23-MD-3084-CRB

1 current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal
2 advice to Uber's leadership and employees related to safety issues, procedures, and policy, among
3 other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants
4 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's June 11, 2025 Brief Pursuant to Special
5 Master Order No. 4 § II (ECF 2933). The facts set forth herein are true and correct and are based on
6 my own personal knowledge, and I could and would competently testify thereto if called.
7

8 2. JCCP_MDL_PRIVLOG096676 is a presentation titled "Insurance Exposure
9 Reduction" and the metadata date is January 9, 2018. The presentation is marked "Privileged &
10 Confidential – Prepared at Direction of Counsel in Anticipation of Litigation." I am one of the
11 collaborators of this presentation, and at the time directly advised the team that prepared the document.
12 This presentation was prepared at my request in anticipation of litigation. Other Uber in-house
13 attorneys and I were closely involved with the development and implementation of the initiatives
14 described in this presentation because they involved a number of legal issues and were motivated by
15 efforts to reduce potential liability against the company and resulting costs. I requested the creation of
16 this slide deck to facilitate my provision of legal advice concerning ways to reduce legal risk and
17 liability arising from safety incidents on the Uber platform. As summarized on slide 2 of
18 JCCP_MDL_PRIVLOG096676, Uber's approach to managing such risks on the platform continued
19 to evolve and become more sophisticated over the years 2015, 2016, and 2017.
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21 3. JCCP_MDL_PRIVLOG096672 is also a PowerPoint presentation titled "Insurance Exposure
22 Reduction." The date on the metadata is May 30, 2018. This presentation is also marked "Privileged
23 & Confidential – Prepared at the Direction of Counsel in Anticipation of Litigation." Like -6676, I
24 directly advised the team that created this document at the time, and this presentation was created at
25
26

1 my direction and anticipation of litigation. Preparing the presentation involved collecting and
2 analyzing data regarding insurance liability and exposure leading to insurance costs, along with driver
3 and rider risk factors, in various geographies to come up with a new methodology for managing these
4 insurance liability risks. Uber's in-house legal department directed the data collection and analysis.

5
6 4. JCCP_MDL_PRIVLOG096704 is a subsequent presentation entitled "Safety
7 Incentives Recommendation." The date on the metadata is May 19, 2019. This presentation is also
8 marked "Privileged & Confidential – Prepared at the Direction of Counsel in Anticipation of
9 Litigation." My team and I were the primary internal attorneys who provided advice to the team that
10 created this presentation at the time, and the presentation was created at our direction and in
11 anticipation of litigation. I was involved throughout the development of these initiatives in an effort
12 to identify ways to reduce Uber's litigation and insurance exposure.

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14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct.

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17 Executed on June 11, 2025.

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By: /s/ 
Scott Binnings